

## **Exhibit 64**

# **SCHOOL DISTRICT/LOCAL GOVERNMENT ENTITY PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO EXCLUDE TESTIMONY OF SCHOOL DISTRICT EXPERTS**

Case No.: 4:22-md-03047-YGR

MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation



**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**

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**In Re: Social Media Adolescent  
Addiction / Personal Injury  
Products Liability Litigation**

*Case No. 4:22-MD-03047-YGR*  
*MDL No. 3047*

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**In the Matter of:  
Charleston County School  
District v. Meta, et al.**

*Case No. 23-cv-04659*

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**Expert Report of Jeffrey E. Meyers**

**May 19, 2025**

**HIGHLY CONFIDENTIAL**

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## **I. Executive Summary of Opinions / Conclusions**

1. Based on my analysis and expertise in financial forensics, it is my opinion that Charleston County School District (“Charleston”) has sustained past damages relating to certain out-of-pocket costs for Select Vendor(s) during the period beginning July 1, 2015 (Fiscal School Year Ending June 30, 2016, “FYE 2015-16”) through June 30, 2025 (Fiscal School Year Ending June 30, 2025, “FYE 2024-25”) as a result of the alleged improper actions of the named Defendants in this matter<sup>1</sup> totaling \$1,003,400, as reflected in Appendix C, Exhibit 1.
2. I hold this opinion to a reasonable degree of certainty in the fields of forensic accounting and lost profits.

## **II. Qualifications**

3. I have extensive experience in performing forensic accounting in connection with calculating past losses. I have performed thousands of lost profit, past compensatory, and other economic damage calculations utilizing forensic accounting over the course of my career for both plaintiffs and defendants utilizing the same common methodology applied in this matter.
4. I have been certified as a Master Analyst in Financial Forensics by The National Association of Certified Valuators and Analysts by having met rigorous standards of professionalism, expertise, objectivity, and integrity in the field of financial litigation support, which includes commercial damages, lost profits, matrimonial litigation, bankruptcy, restructuring, intellectual property damages, personal injury and wrongful death, forensic accounting, fraud investigations, and fraud risk management.
5. I have extensive experience relating to the calculation of lost profits, past compensatory, and other economic damages for individual entities by utilizing the application of a common methodology for classes of individuals and businesses using the same type of adequate financial information as described herein.
6. I have been qualified as an expert in various Federal and State Courts, FINRA Arbitrations, and other Arbitration Proceedings as detailed on my Curriculum Vitae attached herein as Appendix A.

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<sup>1</sup> The named Defendants include Meta Platforms, Inc., Facebook Holdings, LLC, Facebook Operations, LLC, Instagram, LLC, Meta Payments Inc., Siculus, Inc., Snap, Inc., ByteDance Inc., TikTok Inc., TikTok Ltd., TikTok LLC, ByteDance Ltd., Google LLC, YouTube LLC. Plaintiffs’ First Amended Master Complaint (Local Government and School District) (Mar. 27, 2024), ECF No. 729.

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7. I have served as a financial expert in the Deepwater Horizon MDL (No. 2179) in the calculation of lost profits and economic damages and as an advisor to the Plaintiff Steering Committee relating to the Deepwater Horizon Economic and Property Damages Settlement Agreement, specifically in connection with the application and calculation of individual and business economic loss calculations.
8. In accordance with Rule 26 of the Federal Rules of Civil Procedure, I do hereby state the following:
  - a. I have not authored any publications within the preceding ten (10) years.
  - b. I am being compensated for my work according to my standard fee schedule, which is \$475 per hour, with the exception of court time and depositions, for which my standard rate is \$950 for the first hour or any part thereof and \$475 for each additional hour or any part thereof.
  - c. My compensation is not dependent on the substance of my opinions.
  - d. I have testified as an expert at trial and/or been deposed within the preceding four (4) years as detailed on my Curriculum Vitae attached herein as Appendix A.

### **III. Materials Reviewed and Exhibit List**

9. As detailed on Appendix B, I itemize the documents I have reviewed and considered in connection with my engagement in this matter.
10. As detailed on Appendix C, I attach the Exhibits referenced below in this matter.
11. It is my understanding that additional discovery may be provided in this matter. Accordingly, I reserve my right to amend or supplement this report as appropriate to the extent that additional relevant information is provided subsequent to the issuance date of this report.

### **IV. Methodology**

12. Forensic accounting services involve the application of specialized knowledge and investigative skills to collect, analyze and evaluate evidential matter and to interpret and communicate findings, in this matter, to a Trier of Fact.

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13. In performing my forensic accounting analysis in this matter, I employed a methodology consistent with generally accepted practices in the field of forensic accounting, and identical to the procedures I apply in my regular professional work. The process involves the application of accounting, auditing, and investigative techniques designed to develop objective, supportable findings suitable for presentation in legal proceedings
14. I have worked with Charleston<sup>2</sup> to identify certain vendors involving costs related to Technology, Social Emotional Learning (SEL) Curriculum, and Mental Health incurred as a result of the alleged improper actions of the Defendants (“Select Vendor(s)”).
15. I have requested, received and reviewed sufficient relevant information to confirm and reconcile the Total Costs incurred for each Select Vendor during the period FYE 2015-16 through FYE 2024-25, as detailed in Appendix C, Exhibit 1.
16. I have analyzed supporting documentation including Financial Statements, Monthly Expenditure Reports and Vendor Expense Ledgers, as detailed in Appendix B, to confirm Select Vendor costs.
17. In connection with my analysis and as detailed on Appendix C, Exhibit 1, I have verified the Total Costs for the Select Vendor(s) to a reasonable degree of financial accounting certainty.

## **V. Analysis**

18. I have been advised that Charleston has incurred certain out-of-pocket costs for Select Vendor(s) (“Vendor Costs”) as a result of the alleged improper actions of Defendants and incurred during the period FYE 2015-16 through FYE 2024-25.
19. As detailed on Appendix C, Exhibit 1, I examined the referenced documents detailing these costs, including the relevant Purchase Order numbers and Expenditure Report detail, and have provided corresponding Bates stamp reference for Charleston’s out-of-pocket costs for Select Vendor(s) incurred during the period FYE 2015-16 through FYE 2024-25.

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<sup>2</sup> Including meeting with Daniel Prentice (Chief Financial Officer) on May 12, 2025

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20. As detailed on Appendix C, Exhibit 1, Charleston's Vendor Costs are summarized as follows:

a. Yondr	\$ 273,953
b. The Flippen Group	1,363,938
c. Panorama Education Inc.	960,525
d. International Institute for Restorative Practices	408,194
e. Committee for Children (Second Step)	646,510
f. Restorative Resolutions	82,775
g. Restorative Coaching	24,000
h. Social Emotional Learning Alliance for South Carolina	<u>12,000</u>
i. Total Costs	<u>\$ 3,771,895</u>

21. Based on the Allison Affidavit, I have been advised that only a percentage of the Vendor Costs were incurred as a result of the alleged improper actions of Defendants.

22. As detailed on Appendix C, Exhibit 1, I have relied upon the Allocation Percent(s) detailed by Charleston in the Allison Affidavit<sup>3</sup> to determine the amount of Vendor Costs attributable to the alleged improper actions of Defendants and incurred during the period FYE 2015-16 through FYE 2024-25.

23. Accordingly, I have calculated Charleston's past damages relating to certain out-of-pocket costs attributable to the alleged improper actions of Defendants and incurred during the period FYE 2015-16 through FYE 2024-25 by multiplying the Allocation Percent(s) by the Vendor Costs.

## VI. Conclusions

24. Based on the above and as summarized on Appendix C, Exhibit 1, Charleston has sustained past damages relating to certain out-of-pocket costs attributable to the alleged improper actions of Defendants and incurred during the period FYE 2015-16 through FYE 2024-25 totaling \$1,003,400.

25. I reserve my right to amend and supplement this report upon receipt of additional relevant information.

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<sup>3</sup> Affidavit of Lisa Allison, Executive Director of Student Support, dated May 15, 2025

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26. As undersigned, I certify my understanding that I owe a primary and overriding duty of candor and professional integrity to help the Court on matters within my expertise and in all submissions to, or testimony before, the Court. As undersigned, I further certify that my report and opinions are not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation.

Sincerely,

  
\_\_\_\_\_  
Jeffrey E. Meyers

\_\_\_\_\_  
May 19, 2025  
Date



# Appendix A

## ***Jeffrey E. Meyers, CVA, MAFF, CFE***

### **Professional & Business History**

Asher Meyers, L.L.C., Co-Founder July 1, 2016 to present  
Loyola University of New Orleans, August 2004 through December 2021  
Harold A. Asher, CPA, L.L.C., January 2005 through June 30, 2016  
University of New Orleans, August 2003 through December 2004  
Louisiana Department of Insurance, September 2001 through July 2003

### **Education**

Master of Science in Mathematics, University of New Orleans, December 2004  
Concentration in Statistics

Bachelor of Science with major in Mathematics, Louisiana State University, July 2003  
Magna Cum Laude, LSU Honors College, Sophomore Honors Distinction

### **Range of Experience**

Mr. Meyers' litigation support and business valuation services include examination and analysis of data, calculations and formulation of projections, and assistance in the discovery, negotiation, deposition and trial processes.

Mr. Meyers has extensive consulting and business valuation experience in various areas, including but not limited to, valuation of commercial business entities, valuation of ownership interest in real estate limited partnerships, valuation of limited liability companies, calculation of income for child support purposes, calculation of child and spousal support, calculation and allocation of assets, liabilities, reimbursement and separate property claims, calculation of damages resulting from securities transactions, asset allocation and suitability determination in securities litigation, calculation of damages resulting from personal injuries, calculation of lost profits, calculation of present value of projected future medical costs, calculation of damages in commercial matters, calculation of damages in construction related matters, calculation of losses relating to business interruption matters, fraud investigation and forensic accounting.

Mr. Meyers' experience includes the application of various statistical concepts including, but not limited to, data analysis, statistical graphs, sampling, regression analysis, data production, probability theory and statistical testing and inference.

### **Qualifications**

Mr. Meyers is qualified as an expert witness in the 24<sup>th</sup> Judicial District Court for the Parish of Jefferson, Civil District Court for the Parish of Orleans, 22<sup>nd</sup> Judicial District Court for the Parish of St. Tammany, 25<sup>th</sup> Judicial District Court for the Parish of Plaquemines, 34<sup>th</sup> Judicial District Court for the Parish of St. Bernard, 16<sup>th</sup> Judicial District Court for the Parish of St. Martin, 33<sup>rd</sup> Judicial District Court for the Parish of Allen, 19<sup>th</sup> Judicial District Court for the Parish of East Baton Rouge, the United States District Court for the Eastern District of Louisiana, the United

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States District Court for the District of Hawaii, the United States District Court for the Eastern District of Virginia, Norfolk Division and the United States Bankruptcy Court, Eastern District of Louisiana.

Mr. Meyers is qualified as an expert witness in FINRA Arbitration, American Arbitration Association (AAA) and Judicial Workplace Arbitrations (JWA) proceedings.

Mr. Meyers has been appointed in the 24<sup>th</sup> Judicial District Court for the Parish of Jefferson, Civil District Court for the Parish of Orleans, the 22<sup>nd</sup> Judicial District Court for the Parish of St. Tammany, the 34<sup>th</sup> Judicial District for the Parish of St. Bernard and the 21<sup>st</sup> Judicial District Court for the Parish of Tangipahoa as a Court Appointed Expert and as a Special Master relating to various areas including, but not limited to, calculation and determination of income, calculation of child and spousal support, and in the calculation and allocation of assets, liabilities, reimbursement claims, and separate property claims.

**Testimony and/or Deposition Experience**

Mr. Meyers has testified as an expert at trial and/or been deposed within the preceding four years in the following matters:

Angela Curbow v Benitez Jaimes and XL Parts, LLC  
*190<sup>th</sup> Judicial District Court of Harris County, Texas*  
*Case No. 2019-79745* (deposition April 2021)

Warren Riley v Latoya Cantrell, Individually and in her official capacity as Mayor of the City of New Orleans and The City of New Orleans  
*United States District Court, Eastern District of Louisiana*  
*Civil Action 19-13950* (deposition April 2021)

Paratech, LLC v St. Bernard Parish Government  
*34<sup>th</sup> Judicial District Court for the Parish of St. Bernard, State of Louisiana*  
*Case No. 14-1331* (trial testimony May 2021)

Derrick Florom v Savage Services Corporation, Savage Industrial Rail Services, Inc., Savage Refinery Services, LLC and Texas City Terminal Railway Company  
*405<sup>th</sup> Judicial District Court of Galveston County, Texas*  
*Cause No. 20-CV-1507* (deposition June 2021)

Scott Sullivan v Margaret Herster  
*Civil District Court for the Parish of Orleans, State of Louisiana*  
*Case No. 19-117* (trial testimony June 2021)

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Luther Murphy v Global Risk Consultants, Corp., ABS Quality Evaluations, Inc., Non-Destructive Inspection Corporation and Zachry Corporation  
*239<sup>th</sup> Judicial District Court of Brazoria County, Texas*  
*Cause No. 104165-CV* (deposition June 2021)

Cameron Bonnett v United States Department of Agriculture  
*United States District Court, Eastern District of Louisiana*  
*Case No. 20-2937* (deposition July 2021)

Patrick Graves v WPX Energy Permian, LLC, AIPC Energy LLC, AIPC Energy, Inc., Decca Consulting, Inc., Paul Sternadel and Billy Lalonde  
*United States District Court for the Western District of Texas, Pecos Division*  
*Civil Action No. 4:20-cv-00021-DC-DF* (deposition August 2021)

Cory Callihan v Inland Construction and Engineering, Inc.  
*In the Circuit Court of the 14<sup>th</sup> Judicial Circuit In And For Bay County Florida*  
*Case No. 2019 CA 003845* (deposition August 2021)

Elegant Massage, LLC d/b/a Light Stream Spa, on behalf of itself and all others similarly situated v State Farm Mutual Automobile Insurance Company and State Farm Fire and Casualty Company  
*In the United States District Court for the Eastern District of Virginia, Norfolk Division*  
*Civil Action No. 2:20-cv-265* (deposition August 2021)

Michael Thomas Kelting v Laura Kelting  
*Civil District Court for the Parish of Orleans, State of Louisiana*  
*No. 2015-11068* (trial testimony August 2021)

Lusia M. Stallworth, individual, and as parent and next friend of K.S., a minor v James W. Murray, individually, and Kreilkamp Trucking, Inc., a domestic business corporation  
*District Court of Ottawa County, State of Oklahoma*  
*Case No. CJ-2019-139* (deposition September 2021)

Javier Castillo v Mi-Jack Products, Inc., Ace Industries, Inc., and James Scott Parchmont  
*269<sup>th</sup> Judicial District Court of Harris County, Texas, Cause No. 2019-84588* (deposition October 2021)

Fred Oswald v Randall C. “Randy” Smith, et al  
*22<sup>nd</sup> Judicial District Court for the Parish of St. Tammany*  
*Case No. 2018-10044* (trial testimony November 2021)

Arthur Carlin v Clear Blue Insurance Company, Central Dispatch, Inc., Centanni Limited Partnership, and Melvin Russell  
*Civil District Court for the Parish of Orleans, State of Louisiana*  
*No. 2020-01571* (deposition February 2021)

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Sonder USA, Inc. v 635 N. Scott, LLC  
*United States District Court for the Eastern District of Louisiana*  
*Civil Action No. 18-13891* (trial testimony March 2022)

Charles Bradley v Load Trail, LLC  
*Judicial Workplace Arbitrations,*  
*JWA No. 3178-A-2020* (arbitration testimony March 2022)

620 Decatur, LLC v New Jax Condominium Association, Inc., New Jax Commercial, LLC,  
Earl Weber and Zurich Insurance Company  
*Civil District Court for the Parish of Orleans, State of Louisiana*  
*No. 2013-7480* (deposition March 2022)

B & P Restaurant Group, LLC, d/b/a The Rum House of New Orleans, et. al v  
Eagan Insurance Agency, LLC  
*Civil District Court for the Parish of Orleans, No. 2020-08775* (deposition May 2022)

New Orleans Louisiana Saints, LLC v Who Dat?, Inc.  
*American Arbitration Association*  
*Action No. 01-19-0002-2628* (arbitration testimony August 2022, August 2020 and July 2020)

John David Warren, Jr., and Laura Warren, Individually, and as Guardians Ad Litem and  
Next Friends to Their Minor Children, D.G.W., A.J.W., J.D.W. III, and A.A.W. v United  
States of America; Hawaii Pacific Health, a Domestic Nonprofit Corporation; Hawaii  
Pacific Health Partners, Inc., a Domestic Nonprofit Corporation, Kapiolani Medical  
Specialists, a Domestic Tax-Exempt Organization; Devin Puapong, M.D.; and Doe  
Defendants 1-10  
*United States District Court for the District of Hawaii*  
*Civil No. 19-00232 JMS-WRP* (trial testimony August 2022)

Patty Dupre, Individually and on Behalf of Her Minor Child, Dylan Dupre and Gage Dupre,  
Individually v Palfinger Marine USA, Inc. and Zurich American Insurance Company  
*United States District Court for the Western District of Louisiana, Lafayette Division*  
*Civil Action No. 6:20-CV-0756 (Consolidated with 6:20-CV-00685 (Lead) 6:20-CV-0773)*  
(deposition August 2022)

Devin Marcel, Individually and on behalf of Gary Marcel Estate v Shell Offshore Inc. et al  
*United States District Court for the Western District of Louisiana, Lafayette Division*  
*Civil Action No. 6:20-CV-0773 (Consolidated with 6:20-CV-00685 (Lead) 6:20-CV-0756)*  
(deposition August 2022)

James Austin Rahaim v Reagyn Long Rahaim  
*22<sup>nd</sup> Judicial District Court for the Parish of St. Tammany*  
*Docket No. 2019-11621* (trial testimony September 2022)

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Steven Burger and Michelle Vought v Protective Insurance Company, Cal-Ark International, Inc., and Gregg M. Landry  
*24<sup>th</sup> Judicial District Court for the Parish of Jefferson*  
*Docket No. 803699 (deposition October 2022)*

Michelle Benoit and Rechelle Wall Individually and on behalf of her minor child, Sydnie Sims v Cal-Ark International Inc., Gregg Landry, and Protective Insurance Company  
*24<sup>th</sup> Judicial District Court for the Parish of Jefferson*  
*Docket No. 796827 C/W: 803699 (deposition October 2022)*

Jack H. Shannon v Julia Westrich Shannon  
*Civil District Court for the Parish of Orleans, State of Louisiana*  
*No. 2005-13100 (trial testimony October 2022 and deposition May 2022)*

Gary Jude Russo v Kim Frances Levy Russo  
*16<sup>th</sup> Judicial District Court for the Parish of St. Martin*  
*No. 72066-G (Report admitted as trial testimony November 2022)*

Succession of Michael Eng Yau Ong a/k/a/ Eng Yau Ong  
*24<sup>th</sup> Judicial District Court for the Parish of Jefferson*  
*No. 800-637 (trial testimony November 2022)*

Shane Smith v Pinnergy, Ltd. v Pipe Pros, LLC  
*345<sup>th</sup> Judicial District Court of Travis County, Texas*  
*Cause No. D-A-GN-20-004757 (deposition November 2022)*

Tunya Brooks v Southland Truck Group, LLC  
*24<sup>th</sup> Judicial District Court for the Parish of Jefferson*  
*No. 810-314 (deposition February 2023)*

In the matter of Falcon Global Offshore II LLC, as owner, Seacor Marine LLC as Manager/Operator and Seacor Liftboats, LLC as Alleged Owner/Operator of the Seacor Power  
*United States District Court, Eastern District of Louisiana*  
*Civil Action No.: 2:21-cv-01062 (deposition April 2023)*

Leslie C. Burton v Robert R. Burton, III  
*22<sup>nd</sup> Judicial District Court for the Parish of St. Tammany*  
*Docket No. 2018-16162 (trial testimony April 2023 and deposition February 2023)*

Paul McGaughy v Labelleco Fab LLC  
*60<sup>th</sup> Judicial District Court of Jefferson County, Texas*  
*Cause No. B-205,237 (deposition May 2023)*

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In Re: Who Dat?, Inc.

*United States Bankruptcy Court, Eastern District of Louisiana*  
*Case No. 21-10292* (trial testimony June 2023 and June 2021)

Kellie Descant Cahn v Mike Cahn

*Civil District Court for the Parish of Orleans, State of Louisiana*  
*No. 2019-11076* (trial testimony June 2023)

In Re: Succession of Nevalle Marie Hambrick Price

*18<sup>th</sup> Judicial District Court for the Parish of Pointe Coupee, State of Louisiana*  
*No. 48,554* (deposition July 2023)

Commercial Restoration Company, LLC v Nanaki, LLC

*33<sup>rd</sup> Judicial District Court for the Parish of Allen, State of Louisiana*  
*No. C-2021-071* (trial testimony July 2023)

Wetlands Mitigation Strategies, LLC v Weyerhaeuser NR Company

*United States District Court, Middle District of Louisiana*  
*No. 21-256-BAJ-SDJ* (deposition July 2023)

Darrell Pagel and Dana Pagel v New Bern Transport Corporation d/b/a NB Transport Corp  
and Paul Rose

*23<sup>rd</sup> Judicial District Court of Wharton County Texas*  
*Cause No. CV53814* (deposition August 2023)

Stacey Griffin, et al v The United States of America

*United States District Court, Eastern District of Louisiana*  
*Case No. 2:22-CV-3694 c/w No. 2:22-CV-3826* (deposition September 2023)

Eva Broussard v Christus Ochsner Health Systems Christus Health Southwestern  
Louisiana

*14<sup>th</sup> Judicial District Court for the Parish Calcasieu, State of Louisiana*  
*Docket No. 2019-3513* (deposition November 2023)

Diya & Om, LLC v AmGuard Insurance Company

*United States District Court, Middle District of Louisiana*  
*Civil Action No: 3:22-cv-00343* (deposition November 2023)

Jay Ambe 2021, LLC v AmGuard Insurance Company

*United States District Court, Middle District of Louisiana*  
*Civil Action No: 3:22-cv-00341* (deposition November 2023)

Jai Mahadev, LLC v AmGuard Insurance Company

*United States District Court, Middle District of Louisiana*  
*Civil Action No: 22-cv-0344* (deposition December 2023)

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Nicholas J. Tusa and Macel B. Tusa v Canal Insurance Company, Taz Trucking, Inc., Jesse K. Pirtle, Ean Holdings, LLC, Berkshire Hathaway Guard Insurance Group, Ciana Patrice Stalberte, and ABC Insurance Company  
*Civil District Court for the Parish of Orleans, State of Louisiana*  
No. 2021-05093 (deposition April 2024)

Sonder Hospitality USA, Inc. v 415 Dauphine, LLC, 717 Conti, LLC, 1001 Chartres Str., LLC, Rampart Hotel Ventures, LLC, 1001 Toulouse, LLC, Royal Hotel Investors, LLC, 1234 Chartres, St. LLC, JAJ Ventures, LLC, 730 Rue Bienville, LLC and Mansion on Esplanade, LLC  
Sonder Hospitality USA, Inc. v St. Ann Lodging, LLC and JAJ Ventures, LLC  
*United States District Court, Eastern District of Louisiana*  
Case No. 2:22-CV-2033 c/w No. 22-2971 (deposition April 2024)

Tiffany Lewis Sanders v Camp Roofing, Ltd., Garrett Hindt and Chris Dortlon  
*125<sup>th</sup> Judicial District Court of Harris County Texas*  
Cause No. 2022-78401 (deposition July 2024)

Tiffany Morris v Robert Morris  
*22<sup>nd</sup> Judicial District Court for the Parish of St. Tammany, State of Louisiana*  
Case No. 202112760 (deposition August 2024)

St. Charles-Guillot Investment, LLC et al v One Source Roofing, Inc. et al  
*United States District Court, Eastern District of Louisiana*  
Case No: 2:23-cv-00030 (deposition August 2024)

Rodolfo Ibarra v Sasol (USA) Corporation, et al  
*295<sup>th</sup> Judicial District Court, Harris County Texas*  
Cause No. 2023-11712 (deposition August 2024)

Jonathan Hull and Hull Logistics, LLC v Roy Laumont Pape, Sr., ECM Transport, LLC and Werner Enterprises, Inc.  
*In the United States District Court for Western District of North Carolina Charlotte Division*  
Case No. 3:23-CV-405 (trial testimony September 2024 and deposition August 2024)

William Pladson and Lee McIntosh v Michael Depetrillo and Meteor, LLC  
*United States District Court for the Eastern District of Louisiana*  
Civil Action No: 23-CV-6408 (trial testimony October 2024)

Trista Landry, individually, and as the Personal Representative of the Estate of Gregory Lindsey, deceased v Cedar Fair, LP; Cedar Fair Management, Inc.; Galveston Waterpark LLC; Jeff Ellis & Associates, Inc.; and Daniel Terrazas  
*190<sup>th</sup> Judicial District Court of Harris County, Texas*  
Cause No. 202361510 (deposition October 2024)



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Phillip Reed v Hency C. Bonds, Bellsouth Telecommunications, LLC d/b/a AT&T LA,  
Old Republic Insurance Company  
*24<sup>th</sup> Judicial District Court for the Parish of Jefferson, State of Louisiana*  
No. 830-451 (deposition February 2025)

Jose Valdivia v Brock Industrial Services, LLC; Brock Services, LLC; and Phillips 66  
Company  
*19<sup>th</sup> Judicial District Court for the Parish of East Baton Rouge, State of Louisiana*  
No. C-731101 (trial testimony February 2025)

Caitlin Michelle Brick v IEPPC Urgent Care, PLLC, a Michigan Professional Limited  
Company, and Colony Billingsley  
*In the Circuit Court for the County of Oakland, State of Michigan*  
Case No. 23-201755-NH (deposition March 2025)

John Vindas and Anna Vindas v Joe Eschete, Lyft, Inc. and Indian Harbor Insurance  
Company  
*Civil District Court for the Parish of Orleans, State of Louisiana*  
No. 2021-08459 (deposition March 2025)

Jennifer Tremblay v Transitional Rehabilitation Services, LLC, in its assumed or common  
name, SBS Leaseco, LLC, in its assumed or common name, and SBS Leaseco Briarcliff,  
LLC in its assumed or common name  
*241<sup>st</sup> Judicial District Court of Smith County, Texas*  
Cause No. 23-3172-C (deposition March 2025)

In the Matter of: Kyle and Kaitlyn Arnaud, et al v North American Specialty Insurance, et  
al  
*17<sup>th</sup> Judicial District Court for the Parish of Lafourche*  
No. 143930 (deposition April 2025)

Jeremy McMonigle v Amazon.com Services, LLC and Anthony Little  
*American Arbitration Association*  
Case No. 01-23-0005-5523 (deposition April 2025)

City Bar, Inc. et al individually and on behalf of all others similarly situated v John Bel  
Edwards, in his official capacity as Governor of the State of Louisiana  
*19<sup>th</sup> Judicial District Court for the Parish of East Baton Rouge, State of Louisiana*  
Case C-703353-22 (trial testimony May 2025 and deposition April 2025)

Tammy Gremillion v. BP Exploration & Production, Inc. & BP America Production  
Company  
*United States District Court for the Eastern District of Louisiana*  
Civil Action No: 22-CV-3209 (deposition May 2025)

## ***Jeffrey E. Meyers, CVA, MAFF, CFE***

### **Special Master / Court Appointed Expert Experience**

Mr. Meyers has been appointed as a Special Master and/or Expert by the Court in the following matters:

Rochelle Peiffer Larson v Emile Gerald Larson  
*24<sup>th</sup> Judicial District Court for the Parish of Jefferson, Case No. 724-068* (appointment November 2018)

Kendra Goodman Glazer v Todd Glazer  
*Civil District Court for the Parish of Orleans Case No. 2018-3729* (appointment October 2019)

Tanoa Rawls Square v Allen Lee Square, Jr.  
*Civil District Court for the Parish of Orleans Case No. 2019-7590* (appointment April 2020)

Kevin D. Lacour v Tracy C. Toups-Lacour  
*22<sup>nd</sup> Judicial District Court for the Parish of St. Tammany Docket No. 2022-12427* (appointment November 2022)

Casey Deblonde Sims v Stephen M. Sims, II  
*34<sup>th</sup> Judicial District Court for the Parish of St. Bernard No. 19-0957* (appointment July 2023)

Alisha Arena v Gregg Arena  
*Civil District Court for the Parish of Orleans No. 2024-02506* (appointment August 2024)

Carrie Christiane Creveling-Benefield v Sean Benefield  
*Civil District Court for the Parish of Orleans No. 2024-02307* (appointment October 2024)

Gina Badan Brown v Richard Mark Brown  
*22<sup>nd</sup> Judicial District Court for the Parish of St. Tammany Docket No. 2024-14463* (appointment October 2024)

Monique Madere Mixon v Richard Clay Mixon  
*21<sup>st</sup> Judicial District Court for the Parish of Tangipahoa Docket No. 2024-0001551* (appointment March 2025)

***Jeffrey E. Meyers, CVA, MAFF, CFE***

**Personal**

Mr. Meyers was designated a Certified Valuation Analyst by the National Association of Certified Valuators and Analysts in May 2009 and a Master Analyst in Financial Forensics co-sponsored by the National Association of Certified Valuators and Analysts as of July 2010.

The Association of Certified Fraud Examiners designated Mr. Meyers a Certified Fraud Examiner in February 2011.

Mr. Meyers is a member of the National Association of Certified Valuators and Analysts, Association of Certified Fraud Examiners and the American Statistical Association.

Mr. Meyers has been an adjunct professor of mathematics (algebra, finite mathematics and statistics) at Loyola University since 2006.

He was previously elected and served on the Litigation Forensics Board for the National Association of Certified Valuators and Analysts.

He also served on the Editorial Board of the National Litigation Consultants' Review and the Board of Tour de Lis, Inc., a cancer support organization.

**Contact Information**

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# Appendix B

**Materials Reviewed and Considered To Date**  
**(Reserving Right to Amend and Supplement as Discovery is Provided)**

1. Pleadings, opinions and other discovery materials in this matter as follows:
  - a. Plaintiff's First Amended Master Complaint (Local Government and School District) dated March 27, 2024
  - b. Plaintiff Fact Sheet – School Districts (Amended) dated May 24, 2024 for Charleston
  - c. Plaintiff Fact Sheet – School Districts (Amended Supplemental) dated July 17, 2024 for Charleston
  - d. School District Bellwether Plaintiffs' Supplemental Initial Disclosure Statement Pursuant to Federal Rule of Civil Procedure 26(A)(1)(A)(iii) dated August 22, 2024
  - e. Order Granting in Part and Denying in Part Defendants' Motion to Dismiss the School District and Local Government Entities' Master Complaint dated October 24, 2024
  - f. Order Granting in Part and Denying in Part Defendants' Motion to Dismiss the School District and Local Government Entities' Claims of Public Nuisance dated November 15, 2024
  - g. Charleston's Second Supplemental Initial Disclosure Statement Pursuant to Federal Rule of Civil Procedure 26(A)(1)(A)(iii) dated November 15, 2024
  - h. Charleston's Answers to Defendants' Interrogatories (Set 2) dated February 10, 2025
  - i. Charleston's Supplemental Answers to Defendants' Interrogatories (Set 1) dated February 12, 2025
  - j. Charleston's Supplemental Answers to Defendants' Interrogatories (Set 3) dated April 23, 2025
  - k. Charleston's Third Supplemental Initial Disclosure Statement Pursuant to Federal Rule of Civil Procedure 26(A)(1)(A)(iii) dated April 23, 2025
  - l. Plaintiff Fact Sheet – School Districts (Third Amended) dated May 24, 2024 for Charleston

**Materials Reviewed and Considered To Date**  
**(Reserving Right to Amend and Supplement as Discovery is Provided)**

2. Charleston Audited Financial Statements (<https://www.ccsdschools.com/divisions/finance/budgeting>) as follows:
  - a. Fiscal Year Ending 2016
  - b. Fiscal Year Ending 2017
  - c. Fiscal Year Ending 2018 (MR\_CCSD\_001644 – 1778)
  - d. Fiscal Year Ending 2019 (MR\_CCSD\_001950 – 1950)
  - e. Fiscal Year Ending 2020 (MR\_CCSD\_002249 - 2383)
  - f. Fiscal Year Ending 2021 (MR\_CCSD\_002555 – 2694)
  - g. Fiscal Year Ending 2022 (MR\_CCSD\_002875 – 3014)
  - h. Fiscal Year Ending 2023 (MR\_CCSD\_003194 – 3330)
  - i. Fiscal Year Ending 2024
3. Charleston Budget Reports (<https://www.ccsdschools.com/divisions/finance/budgeting>) as follows:
  - a. Fiscal Year Ending 2018 (MR\_CCSD\_001466)
  - b. Fiscal Year Ending 2019 (MR\_CCSD\_001779)
  - c. Fiscal Year Ending 2020 (MR\_CCSD\_002085)
  - d. Fiscal Year Ending 2021 (MR\_CCSD\_002384)
  - e. Fiscal Year Ending 2022 (MR\_CCSD\_002695)
  - f. Fiscal Year Ending 2023 (MR\_CCSD\_003015)
  - g. Fiscal Year Ending 2024 (MR\_CCSD\_003331)
4. Charleston Trial Balance Ledger Reports for the Fiscal Years Ending 2015 through 2024 (MR\_CCSD\_740375 through MR\_CCSD\_740384)
5. Charleston Monthly Expenditure Reports for the period January 2014 through April 2024 (MR\_CCSD\_749128 through MR\_CCSD\_777609) and May 2024 through April 2025 (<https://www.ccsdschools.com/divisions/finance/transparency>)
6. Charleston Vendor Expense Ledger Reports (MR\_CCSD\_779236)
7. Affidavit of Daniel Prentice, Chief Financial Officer, dated May 14, 2025 (“Prentice Affidavit”)
8. Affidavit of Lisa Allison, Executive Director of Student Support, dated May 15, 2025 (“Allison Affidavit”)

# Appendix C

# Charleston v. Social Media

## Damages Summary

For the Fiscal Years Ending 2015-16 through 2024-25

Vendor				Reference	Vendor Cost	Allocation Percent	Damages	
#	Date	Year	Purchase Order				Total	Cumulative
A	B	C	D	E	F	G	H = (F X G)	I

### A. Third Party Vendors

#### 1. Yondr

03/02/21	2020-21	PO-2103284	MR_CCSD_779236 / Prentice Affidavit	14,275	100.00%	14,275	
09/30/21	2021-22	PO-2201769	MR_CCSD_779236 / Prentice Affidavit	12,775	100.00%	12,775	
07/18/22	2022-23	PO-2300194	MR_CCSD_779236 / Prentice Affidavit	10,645	100.00%	10,645	
07/26/22	2022-23	PO-2300401	MR_CCSD_779236 / Prentice Affidavit	17,600	100.00%	17,600	
07/27/22	2022-23	PO-2300452	MR_CCSD_779236 / Prentice Affidavit	6,173	100.00%	6,173	
08/01/22	2022-23	PO-2300508	MR_CCSD_779236 / Prentice Affidavit	10,175	100.00%	10,175	
08/11/22	2022-23	PO-2300689	MR_CCSD_779236 / Prentice Affidavit	8,395	100.00%	8,395	
11/02/22	2022-23	PO-2302207	MR_CCSD_779236 / Prentice Affidavit	4,725	100.00%	4,725	
08/02/23	2023-24	PO-2400465	MR_CCSD_779236 / Prentice Affidavit	11,340	100.00%	11,340	
08/15/23	2023-24	PO-2400678	MR_CCSD_779236 / Prentice Affidavit	7,298	100.00%	7,298	
08/29/23	2023-24	PO-2400986	MR_CCSD_779236 / Prentice Affidavit	8,131	100.00%	8,131	
06/26/24	2023-24	PO-2405537	MR_CCSD_779236 / Prentice Affidavit	159,821	100.00%	159,821	
12/12/24	2024-25	PO-2502512	MR_CCSD_779236 / Prentice Affidavit	2,601	100.00%	2,601	273,953

#### 2. The Flippen Group

07/16/15	2015-16	PO-1600188	MR_CCSD_779236 / Prentice Affidavit	47,100	7.00%	3,297	
09/17/15	2015-16	PO-1601256	MR_CCSD_779236 / Prentice Affidavit	24,800	7.00%	1,736	
02/24/16	2015-16	PO-1603341	MR_CCSD_779236 / Prentice Affidavit	26,300	7.00%	1,841	
07/12/16	2016-17	PO-1700060	MR_CCSD_779236 / Prentice Affidavit	26,300	7.00%	1,841	
08/10/16	2016-17	PO-1700518	MR_CCSD_779236 / Prentice Affidavit	46,800	7.00%	3,276	
10/18/16	2016-17	PO-1701189	MR_CCSD_779236 / Prentice Affidavit	13,500	7.00%	945	
12/15/16	2016-17	PO-1701691	MR_CCSD_779236 / Prentice Affidavit	7,500	7.00%	525	



# Charleston v. Social Media

## *Damages Summary* *For the Fiscal Years Ending 2015-16 through 2024-25*

Vendor				Reference	Vendor Cost	Allocation Percent	Damages	
#	Date	Year	Purchase Order				Total	Cumulative
A	B	C	D	E	F	G	H = ( F X G )	I
	01/13/17	2016-17	PO-1701788	MR_CCSD_779236 / Prentice Affidavit	22,300	7.00%	1,561	
	02/21/17	2016-17	PO-1702129	MR_CCSD_779236 / Prentice Affidavit	130,000	7.00%	9,100	
	03/03/17	2016-17	PO-1702228	MR_CCSD_779236 / Prentice Affidavit	39,000	7.00%	2,730	
	03/28/17	2016-17	PO-1702560	MR_CCSD_779236 / Prentice Affidavit	26,000	7.00%	1,820	
	04/04/17	2016-17	PO-1702643	MR_CCSD_779236 / Prentice Affidavit	22,500	7.00%	1,575	
	07/17/17	2017-18	PO-1800160	MR_CCSD_779236 / Prentice Affidavit	26,000	7.00%	1,820	
	08/14/17	2017-18	PO-1800562	MR_CCSD_779236 / Prentice Affidavit	698	7.00%	49	
	08/15/17	2017-18	PO-1800588	MR_CCSD_779236 / Prentice Affidavit	22,500	7.00%	1,575	
	08/17/17	2017-18	PO-1800613	MR_CCSD_779236 / Prentice Affidavit	6,500	7.00%	455	
	12/01/17	2017-18	PO-1801833	MR_CCSD_779236 / Prentice Affidavit	64,800	7.00%	4,536	
	12/06/17	2017-18	PO-1801874	MR_CCSD_779236 / Prentice Affidavit	26,000	7.00%	1,820	
	12/19/17	2017-18	PO-1801983	MR_CCSD_779236 / Prentice Affidavit	6,500	7.00%	455	
	01/24/18	2017-18	PO-1802169	MR_CCSD_779236 / Prentice Affidavit	25,000	7.00%	1,750	
	02/15/18	2017-18	PO-1802439	MR_CCSD_779236 / Prentice Affidavit	5,800	7.00%	406	
	04/27/18	2017-18	PO-1803429	MR_CCSD_779236 / Prentice Affidavit	68,500	7.00%	4,795	
	07/24/18	2018-19	PO-1900364	MR_CCSD_779236 / Prentice Affidavit	26,000	7.00%	1,820	
	09/07/18	2018-19	PO-1900913	MR_CCSD_779236 / Prentice Affidavit	481	7.00%	34	
	10/04/18	2018-19	PO-1901149	MR_CCSD_779236 / Prentice Affidavit	47,000	7.00%	3,290	
	11/06/18	2018-19	PO-1901535	MR_CCSD_779236 / Prentice Affidavit	67,500	7.00%	4,725	
	11/19/18	2018-19	PO-1901661	MR_CCSD_779236 / Prentice Affidavit	11,000	7.00%	770	
	02/18/19	2018-19	PO-1902439	MR_CCSD_779236 / Prentice Affidavit	289	7.00%	20	
	02/19/19	2018-19	PO-1902474	MR_CCSD_779236 / Prentice Affidavit	22,500	7.00%	1,575	
	05/10/19	2018-19	PO-1903467	MR_CCSD_779236 / Prentice Affidavit	4,000	7.00%	280	
	07/30/19	2019-20	PO-2000433	MR_CCSD_779236 / Prentice Affidavit	5,500	7.00%	385	
	09/03/19	2019-20	PO-2000813	MR_CCSD_779236 / Prentice Affidavit	11,250	7.00%	788	

# Charleston v. Social Media

## Damages Summary

For the Fiscal Years Ending 2015-16 through 2024-25

Vendor				Reference	Vendor Cost	Allocation Percent	Damages	
#	Date	Year	Purchase Order				Total	Cumulative
A	B	C	D	E	F	G	H = ( F X G )	I
	10/02/19	2019-20	PO-2001206	MR_CCSD_779236 / Prentice Affidavit	11,250	7.00%	788	
	10/17/19	2019-20	PO-2001377	MR_CCSD_779236 / Prentice Affidavit	36,100	7.00%	2,527	
	10/25/19	2019-20	PO-2001483	MR_CCSD_779236 / Prentice Affidavit	43,600	7.00%	3,052	
	12/20/19	2019-20	PO-2002138	MR_CCSD_779236 / Prentice Affidavit	27,100	7.00%	1,897	
	03/02/20	2019-20	PO-2002740	MR_CCSD_779236 / Prentice Affidavit	5,500	7.00%	385	
	08/10/20	2020-21	PO-2100635	MR_CCSD_779236 / Prentice Affidavit	1,500	7.00%	105	
	09/02/20	2020-21	PO-2100979	MR_CCSD_779236 / Prentice Affidavit	42,000	7.00%	2,940	
	09/08/20	2020-21	PO-2101091	MR_CCSD_779236 / Prentice Affidavit	28,500	7.00%	1,995	
	09/24/20	2020-21	PO-2101295	MR_CCSD_779236 / Prentice Affidavit	3,120	7.00%	218	
	05/03/21	2020-21	PO-2104144	MR_CCSD_779236 / Prentice Affidavit	8,500	7.00%	595	
	08/12/21	2021-22	PO-2200737	MR_CCSD_779236 / Prentice Affidavit	42,000	7.00%	2,940	
	08/12/21	2021-22	PO-2200726	MR_CCSD_779236 / Prentice Affidavit	3,000	7.00%	210	
	08/20/21	2021-22	PO-2200849	MR_CCSD_779236 / Prentice Affidavit	3,000	7.00%	210	
	08/30/21	2021-22	PO-2201079	MR_CCSD_779236 / Prentice Affidavit	4,000	7.00%	280	
	03/25/22	2021-22	PO-2203689	MR_CCSD_779236 / Prentice Affidavit	7,000	7.00%	490	
	07/27/22	2022-23	PO-2300432	MR_CCSD_779236 / Prentice Affidavit	4,000	7.00%	280	
	08/11/22	2022-23	PO-2300712	MR_CCSD_779236 / Prentice Affidavit	5,000	7.00%	350	
	08/25/22	2022-23	PO-2300955	MR_CCSD_779236 / Prentice Affidavit	41,900	7.00%	2,933	
	08/26/22	2022-23	PO-2300993	MR_CCSD_779236 / Prentice Affidavit	22,500	7.00%	1,575	
	09/15/22	2022-23	PO-2301512	MR_CCSD_779236 / Prentice Affidavit	5,000	7.00%	350	
	11/22/22	2022-23	PO-2302440	MR_CCSD_779236 / Prentice Affidavit	44,900	7.00%	3,143	
	11/28/22	2022-23	PO-2302463	MR_CCSD_779236 / Prentice Affidavit	22,500	7.00%	1,575	
	12/07/22	2022-23	PO-2302579	MR_CCSD_779236 / Prentice Affidavit	23,000	7.00%	1,610	
	08/15/23	2023-24	PO-2400700	MR_CCSD_779236 / Prentice Affidavit	27,900	7.00%	1,953	
	05/13/24	2023-24	PO-2404889	MR_CCSD_779236 / Prentice Affidavit	21,150	7.00%	1,481	95,476

# Charleston v. Social Media

## Damages Summary For the Fiscal Years Ending 2015-16 through 2024-25

Vendor				Reference	Vendor Cost	Allocation Percent	Damages	
#	Date	Year	Purchase Order				Total	Cumulative
A	B	C	D	E	F	G	H = (F X G)	I
3. Panorama Education Inc.								
	03/24/17	2016-17	PO-1702522	MR_CCSD_779236 / Prentice Affidavit	15,000	20.00%	3,000	
	09/29/21	2021-22	PO-2201737	MR_CCSD_779236 / Prentice Affidavit	88,000	20.00%	17,600	
	11/04/21	2021-22	PO-2202201	MR_CCSD_779236 / Prentice Affidavit	125,000	20.00%	25,000	
	06/21/22	2021-22	PO-2204864	MR_CCSD_779236 / Prentice Affidavit	125,000	20.00%	25,000	
	07/18/22	2022-23	PO-2300185	MR_CCSD_779236 / Prentice Affidavit	88,000	20.00%	17,600	
	11/07/22	2022-23	PO-2302274	MR_CCSD_779236 / Prentice Affidavit	5,000	20.00%	1,000	
	01/26/23	2022-23	PO-2302974	MR_CCSD_779236 / Prentice Affidavit	50,000	20.00%	10,000	
	06/19/23	2022-23	PO-2305066	MR_CCSD_779236 / Prentice Affidavit	132,625	20.00%	26,525	
	09/14/23	2023-24	PO-2401202	MR_CCSD_779236 / Prentice Affidavit	32,400	20.00%	6,480	
	11/03/23	2023-24	PO-2401977	MR_CCSD_779236 / Prentice Affidavit	51,700	20.00%	10,340	
	06/07/24	2023-24	PO-2405276	MR_CCSD_779236 / Prentice Affidavit	172,300	20.00%	34,460	
	10/09/24	2024-25	PO-2501640	MR_CCSD_779236 / Prentice Affidavit	75,500	20.00%	15,100	192,105
4. International Institute for Restorative Practices								
	08/07/17	2017-18	PO-1800457	MR_CCSD_779236 / Prentice Affidavit	31,440	40.00%	12,576	
	01/16/18	2017-18	PO-1802090	MR_CCSD_779236 / Prentice Affidavit	5,200	40.00%	2,080	
	07/18/18	2018-19	PO-1900248	MR_CCSD_779236 / Prentice Affidavit	12,185	40.00%	4,874	
	01/25/19	2018-19	PO-1902154	MR_CCSD_779236 / Prentice Affidavit	21,500	40.00%	8,600	
	09/10/19	2019-20	PO-2000876	MR_CCSD_779236 / Prentice Affidavit	10,960	40.00%	4,384	
	02/11/20	2019-20	PO-2002543	MR_CCSD_779236 / Prentice Affidavit	2,880	40.00%	1,152	
	03/11/20	2019-20	PO-2002861	MR_CCSD_779236 / Prentice Affidavit	9,900	40.00%	3,960	
	04/14/20	2019-20	PO-2003156	MR_CCSD_779236 / Prentice Affidavit	6,970	40.00%	2,788	

# Charleston v. Social Media

## Damages Summary For the Fiscal Years Ending 2015-16 through 2024-25

Vendor				Reference	Vendor Cost	Allocation Percent	Damages	
#	Date	Year	Purchase Order				Total	Cumulative
A	B	C	D	E	F	G	H = ( F X G )	I
	04/27/21	2020-21	PO-2104064	MR_CCSD_779236 / Prentice Affidavit	3,570	40.00%	1,428	
	06/15/21	2020-21	PO-2104829	MR_CCSD_779236 / Prentice Affidavit	11,200	40.00%	4,480	
	07/07/21	2021-22	PO-2200046	MR_CCSD_779236 / Prentice Affidavit	11,382	40.00%	4,553	
	09/10/21	2021-22	PO-2201485	MR_CCSD_779236 / Prentice Affidavit	5,600	40.00%	2,240	
	10/20/21	2021-22	PO-2202033	MR_CCSD_779236 / Prentice Affidavit	52,034	40.00%	20,814	
	11/05/21	2021-22	PO-2202220	MR_CCSD_779236 / Prentice Affidavit	12,421	40.00%	4,969	
	07/18/22	2022-23	PO-2300182	MR_CCSD_779236 / Prentice Affidavit	22,940	40.00%	9,176	
	08/09/22	2022-23	PO-2300636	MR_CCSD_779236 / Prentice Affidavit	14,509	40.00%	5,803	
	10/11/22	2022-23	PO-2301855	MR_CCSD_779236 / Prentice Affidavit	11,408	40.00%	4,563	
	01/03/23	2022-23	PO-2302758	MR_CCSD_779236 / Prentice Affidavit	34,815	40.00%	13,926	
	08/23/23	2023-24	PO-2400853	MR_CCSD_779236 / Prentice Affidavit	11,465	40.00%	4,586	
	08/31/23	2023-24	PO-2401047	MR_CCSD_779236 / Prentice Affidavit	9,790	40.00%	3,916	
	07/15/24	2024-25	PO-2500124	MR_CCSD_779236 / Prentice Affidavit	13,287	40.00%	5,315	
	07/30/24	2024-25	PO-2500408	MR_CCSD_779236 / Prentice Affidavit	21,530	40.00%	8,612	
	08/03/24	2024-25	PO-2500477	MR_CCSD_779236 / Prentice Affidavit	2,842	40.00%	1,137	
	08/08/24	2024-25	PO-2500595	MR_CCSD_779236 / Prentice Affidavit	10,305	40.00%	4,122	
	10/30/24	2024-25	PO-2501932	MR_CCSD_779236 / Prentice Affidavit	33,016	40.00%	13,206	
	12/06/24	2024-25	PO-2502436	MR_CCSD_779236 / Prentice Affidavit	8,259	40.00%	3,304	
	03/17/25	2024-25	PO-2503567	MR_CCSD_779236 / Prentice Affidavit	16,783	40.00%	6,713	163,278

### 5. Committee For Children (Second Step)

10/21/16	2016-17	Expenditure Report	MR_CCSD_759377	2,195	35.00%	768
12/13/16	2016-17	Expenditure Report	MR_CCSD_759806	878	35.00%	307
02/20/17	2016-17	Expenditure Report	MR_CCSD_760298	419	35.00%	147
02/20/17	2016-17	Expenditure Report	MR_CCSD_760310	1,179	35.00%	413

# Charleston v. Social Media

## *Damages Summary* *For the Fiscal Years Ending 2015-16 through 2024-25*

Vendor				Reference	Vendor Cost	Allocation Percent	Damages	
#	Date	Year	Purchase Order				Total	Cumulative
A	B	C	D	E	F	G	H = ( F X G )	I
	04/21/17	2016-17	Expenditure Report	MR_CCSD_760763	399	35.00%	140	
	04/21/17	2016-17	Expenditure Report	MR_CCSD_760786	4,338	35.00%	1,518	
	04/21/17	2016-17	Expenditure Report	MR_CCSD_760787	7,994	35.00%	2,798	
	05/19/17	2016-17	Expenditure Report	MR_CCSD_761063	878	35.00%	307	
	05/19/17	2016-17	Expenditure Report	MR_CCSD_761073	10,745	35.00%	3,761	
	06/20/17	2016-17	Expenditure Report	MR_CCSD_761338	9,878	35.00%	3,457	
	07/13/17	2017-18	Expenditure Report	MR_CCSD_761363	100,210	35.00%	35,073	
	07/19/17	2017-18	Expenditure Report	MR_CCSD_761510	1,190	35.00%	417	
	07/19/17	2017-18	Expenditure Report	MR_CCSD_761516	21,731	35.00%	7,606	
	08/17/17	2017-18	Expenditure Report	MR_CCSD_761683	808	35.00%	283	
	08/17/17	2017-18	Expenditure Report	MR_CCSD_761687	1,316	35.00%	461	
	10/12/17	2017-18	Expenditure Report	MR_CCSD_761741	3,371	35.00%	1,180	
	10/23/17	2017-18	Expenditure Report	MR_CCSD_761904	439	35.00%	154	
	10/23/17	2017-18	Expenditure Report	MR_CCSD_761904	439	35.00%	154	
	10/23/17	2017-18	Expenditure Report	MR_CCSD_761904	439	35.00%	154	
	12/18/17	2017-18	Expenditure Report	MR_CCSD_762238	439	35.00%	154	
	12/18/17	2017-18	Expenditure Report	MR_CCSD_762259	7,040	35.00%	2,464	
	04/20/18	2017-18	Expenditure Report	MR_CCSD_763599	505	35.00%	177	
	04/20/18	2017-18	Expenditure Report	MR_CCSD_763609	918	35.00%	321	
	04/20/18	2017-18	Expenditure Report	MR_CCSD_763625	5,007	35.00%	1,752	
	05/21/18	2017-18	Expenditure Report	MR_CCSD_764033	1,310	35.00%	459	
	06/25/18	2017-18	Expenditure Report	MR_CCSD_764435	2,191	35.00%	767	
	06/25/18	2017-18	Expenditure Report	MR_CCSD_764441	8,771	35.00%	3,070	
	06/25/18	2017-18	Expenditure Report	MR_CCSD_764443	15,285	35.00%	5,350	
	10/25/18	2018-19	Expenditure Report	MR_CCSD_764919	2,359	35.00%	826	

# Charleston v. Social Media

## *Damages Summary* *For the Fiscal Years Ending 2015-16 through 2024-25*

Vendor				Reference	Vendor Cost	Allocation Percent	Damages	
#	Date	Year	Purchase Order				Total	Cumulative
A	B	C	D	E	F	G	H = ( F X G )	I
	10/25/18	2018-19	Expenditure Report	MR_CCSD_764919	10,798	35.00%	3,779	
	10/25/18	2018-19	Expenditure Report	MR_CCSD_764919	60,802	35.00%	21,281	
	04/11/19	2018-19	Expenditure Report	MR_CCSD_766218	5,999	35.00%	2,100	
	06/27/19	2018-19	Expenditure Report	MR_CCSD_766723	4,688	35.00%	1,641	
	06/27/19	2018-19	Expenditure Report	MR_CCSD_766723	9,703	35.00%	3,396	
	06/27/19	2018-19	Expenditure Report	MR_CCSD_766723	30,159	35.00%	10,556	
	10/31/19	2019-20	Expenditure Report	MR_CCSD_767389	29,696	35.00%	10,393	
	12/19/19	2019-20	Expenditure Report	MR_CCSD_767832	6,599	35.00%	2,310	
	02/27/20	2019-20	Expenditure Report	MR_CCSD_768277	9,090	35.00%	3,182	
	02/27/20	2019-20	Expenditure Report	MR_CCSD_768277	11,878	35.00%	4,157	
	03/17/20	2019-20	Expenditure Report	MR_CCSD_768474	12,550	35.00%	4,392	
	06/11/20	2019-20	Expenditure Report	MR_CCSD_768943	9	35.00%	3	
	06/11/20	2019-20	Expenditure Report	MR_CCSD_768943	22	35.00%	8	
	06/11/20	2019-20	Expenditure Report	MR_CCSD_768943	296	35.00%	104	
	06/11/20	2019-20	Expenditure Report	MR_CCSD_768943	1,050	35.00%	368	
	11/12/20	2020-21	Expenditure Report	MR_CCSD_769692	2,454	35.00%	859	
	11/12/20	2020-21	Expenditure Report	MR_CCSD_769692	2,634	35.00%	922	
	11/12/20	2020-21	Expenditure Report	MR_CCSD_769692	10,532	35.00%	3,686	
	11/12/20	2020-21	Expenditure Report	MR_CCSD_769692	28,761	35.00%	10,066	
	03/11/21	2020-21	Expenditure Report	MR_CCSD_770317	11,154	35.00%	3,904	
	03/25/21	2020-21	Expenditure Report	MR_CCSD_770317	13,792	35.00%	4,827	
	09/01/22	2022-23	Expenditure Report	MR_CCSD_773666	109	35.00%	38	
	10/06/22	2022-23	Expenditure Report	MR_CCSD_773912	19,144	35.00%	6,700	
	03/09/23	2022-23	Expenditure Report	MR_CCSD_774907	21,521	35.00%	7,532	
	03/30/23	2022-23	Expenditure Report	MR_CCSD_774907	19,584	35.00%	6,854	

# Charleston v. Social Media

## *Damages Summary* *For the Fiscal Years Ending 2015-16 through 2024-25*

Vendor				Reference	Vendor Cost	Allocation Percent	Damages	
#	Date	Year	Purchase Order				Total	Cumulative
A	B	C	D	E	F	G	H = ( F X G )	I
	07/25/23	2023-24	Expenditure Report	MR_CCSD_775615	15,828	35.00%	5,540	
	01/04/24	2023-24	Expenditure Report	MR_CCSD_776806	7,441	35.00%	2,604	
	05/09/24	2023-24	Expenditure Report		17,993	35.00%	6,297	
	08/01/24	2024-25	Expenditure Report	<a href="https://www.ccsdschools.com/divisions/finance/transparency">https://www.ccsdschools.com/divisions/finance/transparency</a>	65,205	35.00%	22,822	
	10/03/24	2024-25	Expenditure Report		4,351	35.00%	1,523	226,278
6.	Restorative Resolutions							
	03/02/21	2020-21	PO-2103285	MR_CCSD_779236 / Prentice Affidavit	5,500	40.00%	2,200	
	08/31/21	2021-22	PO-2201116	MR_CCSD_779236 / Prentice Affidavit	25,250	40.00%	10,100	
	03/16/22	2021-22	PO-2203573	MR_CCSD_779236 / Prentice Affidavit	2,375	40.00%	950	
	09/13/22	2022-23	PO-2301460	MR_CCSD_779236 / Prentice Affidavit	14,550	40.00%	5,820	
	07/26/23	2023-24	PO-2400366	MR_CCSD_779236 / Prentice Affidavit	9,000	40.00%	3,600	
	10/03/23	2023-24	PO-2401485	MR_CCSD_779236 / Prentice Affidavit	7,000	40.00%	2,800	
	01/31/24	2023-24	PO-2402996	MR_CCSD_779236 / Prentice Affidavit	2,100	40.00%	840	
	02/19/24	2023-24	PO-2403318	MR_CCSD_779236 / Prentice Affidavit	10,000	40.00%	4,000	
	03/26/24	2023-24	PO-2404008	MR_CCSD_779236 / Prentice Affidavit	2,000	40.00%	800	
	07/16/24	2024-25	PO-2500159	MR_CCSD_779236 / Prentice Affidavit	4,000	40.00%	1,600	
	08/05/24	2024-25	PO-2500487	MR_CCSD_779236 / Prentice Affidavit	1,000	40.00%	400	33,110
7.	Restorative Coaching							
	03/06/23	2022-23	PO-2303591	MR_CCSD_779236 / Prentice Affidavit	16,950	40.00%	6,780	
	05/02/24	2023-24	PO-2404723	MR_CCSD_779236 / Prentice Affidavit	4,750	40.00%	1,900	
	05/07/24	2023-24	PO-2404816	MR_CCSD_779236 / Prentice Affidavit	2,300	40.00%	920	9,600

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## *Damages Summary* *For the Fiscal Years Ending 2015-16 through 2024-25*

Vendor				Reference	Vendor Cost	Allocation Percent	Damages	
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A	B	C	D	E	F	G	H = ( F X G )	I
8.	Social Emotional Learning Alliance for South Carolina							
	03/14/24	2023-24	PO-2403809	MR_CCSD_779236 / Prentice Affidavit	3,000	80.00%	2,400	
	03/26/24	2023-24	PO-2404006	MR_CCSD_779236 / Prentice Affidavit	3,000	80.00%	2,400	
	03/28/24	2023-24	PO-2404041	MR_CCSD_779236 / Prentice Affidavit	6,000	80.00%	4,800	9,600
9.	Total Third Party Vendors				3,771,895		1,003,400	1,003,400
B.	<u>Total Overall Vendor Costs</u>				3,771,895		1,003,400	